

# EXHIBIT 6



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November 7, 2018

Todd L. Disher  
Special Counsel for Civil Litigation  
Office of the Attorney General of Texas  
P.O. Box 12548  
Austin, TX 78711-2548

RE: *State of Texas, et al. v. USA, et al.*,  
Civil Action No. 1:18-cv-00068

Dear Mr. Disher:

I write on behalf of Defendant-Intervenors Karla Perez *et al.* ("Defendant-Intervenors") in the above-captioned case regarding the initial disclosures you sent to us yesterday on behalf of all Plaintiffs.

The initial disclosures you provided only identify documents and individuals likely to have information relevant to the State of Texas; they do not identify any information subject to disclosure under Rule 26(a) related to any claim of injury by other Plaintiffs. Under the Federal Rules, all parties are required to provide initial disclosures. *See* Fed. R. Civ. P. 26(a) ("[A] party must, without awaiting a discovery request, provide [initial disclosures] to the other parties . . ."). In addition, under the parties' Joint Discovery Case Management Plan, your office represented that initial disclosures of all Plaintiffs "should be due November 6, 2018." *See* ECF 335 at 4.

Please confirm whether any Plaintiff other than the State of Texas will be providing initial disclosures as required under the Federal Rules.

Sincerely,

Nina Perales  
Vice President of Litigation